# UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT

# BUREAU FOR HUMANITARIAN RESPONSE OFFICE OF FOOD FOR PEACE DEVELOPMENT PROGRAMS TEAM

# FINAL

# P.L. 480 TITLE II GUIDELINES for FY 2003 DEVELOPMENT ASSISTANCE PROGRAMS:

DAP Proposals
DAP Amendments

October 30, 2001

#### LIST OF ACRONYMS

- ADS Automated Directives System
- AER Annual Estimate of Requirements
- AID Agency for International Development
- AIDS Acquired Immune Deficiency Syndrome
- BEO Bureau Environmental Officer
- BHR Bureau for Humanitarian Response
- BNT Bags, Needles & Twine
- CBO Country Backstop Officer
- CFR Code of Federal Regulations
- CBJ Congressional Budget Justification (formerly known as the Congressional Presentation)
- CS Cooperating Sponsor
- CSR Commodity Status Report
- CSR4 Cooperating Sponsor Results Report and Resource Request
- DA Development Assistance
- DAP Development Assistance Program
- EA Environmental Assessment
- EDM Environmental Documentation Manual
- ESR Environmental Status Report
- EXO Executive Officer
- FACG Food Aid Consultative Group
- FAM Food Aid Management
- FFP Office of Food for Peace
- FFPIS Food for Peace Information System
- FFW Food for Work
- FY Fiscal Year
- HIV Human Immunodeficiency Virus
- IEE Initial Environmental Examination
- ISA Institutional Support Assistance Grant
- ITSH Internal Transport, Storage, and Handling
- LOA Life of Activity
- LDC/LIFDC- Least Developed Country/Low Income Food Deficit Country
- LIFE- Leadership and Investment in Fighting an Epidemic
- MCH Maternal and Child Health
- MOU Memorandum of Understanding
- MT Metric Ton
- NICRA Negotiated Indirect Cost Rate Agreement
- NGO Non-governmental Organization
- PAA Previously Approved Activity
- PEA Programmatic Environmental Assessment
- P.L. Public Law
- PVO Private and Voluntary Organization
- R2 Results Report
- CSR4 Cooperating Sponsor Results Report and Resource Request
- REDSO Regional Economic Development Service Office
- REO Regional Environmental Officer
- RFFPO Regional Food for Peace Officer
- SO Strategic Objective
- UMR Usual Marketing Requirements
- USAID United States Agency for International Development
- U.S.C. United States Code
- USDA United States Department of Agriculture
- WFP World Food Program

# TABLE OF CONTENTS

INTI	RODUCTION	1
DEVELOPMENT ASSISTANCE PROGRAM PROPOSALS		
I.	Standard Submission and Review Cycle	1
II.	Development Program Submission Models	2
	A. Coordinated Country Development Programs	2
	B. Regional Development Programs	3
	C. Stand-alone Individual Development Programs	4
III.	Proposal Submission in Countries with "Re-delegated" Missions	4
IV.	Proposal Submission in Countries without USAID Missions/	
	Regional Proposal Submission	5
V.	Procedures for Final Year of DAP	5
VI.	Proposal Review and Approval Criteria	5
	A. Technical Quality	5
	B. Geographic and Sectoral Focus	7
	C. Legislative Mandates	7
	D. Integration and Partnership	7
	E. Cooperating Sponsor Capacity	8
VII.	Instructions for CS Preparation of DAP Proposals	8
	A. Executive Summary	8
	B. Problem Analysis and Proposed Interventions	9
	C. Program Objectives and Design	9
	D. Complementarity	10
	E. Detailed Implementation Schedule	11
	F. Audits	11
	G. Monitoring and Evaluation	11
	H. Commodity Market Issues	12
	I. Activity Resource Requirements	13
	J. Waiver Requirements	15
	K. Initial Environmental Examination	15
	L. Certification Regarding Lobbying	15
	M. Agreements, Contracts, Letters	15

DEVELO	PMENT ASSISTANCE PROGRAM AMENDMENTS		16
I. DAP A	mendment Submission and Review Process		16
A.	Standard Submission and Review Cycle		16
	DAP Amendment Submission under "Re-delegated" Missions		17
C.	Consolidated (Country and Regional) DAP Amendments		17
D.	DAP Amendment Review Process		17
E.	DAP Amendment Review and Approval Criteria	17	
II. Instru	actions for CS Preparation of DAP Amendments		18
	Executive Summary		18
B.	Rationale for DAP Amendments		18
C.	Revised Program Details		18
D.	Proposed FY Detailed Implementation Schedule		19
E.	Activity Resource Requirements		19
F.	Waiver Requirements		20
G.	Environmental Compliance		21
H.	Appendices		21
ANNEXE	S.S.		
A.	DAP Proposal Format		
B.	DAP Amendment Format		
C.	AER Format		
D.	Budget Formats		
E.	Budget Instructions		
F.	Environmental Compliance Documentation Instructions		
G.	Commonly-Used Value Added Commodities List		
H.	Supplemental Information List		

Note: If this is an electronic version of this document, check page numbers as font changes or margin parameters may affect pagination.

#### INTRODUCTION TO GUIDELINES

These guidelines are issued under Section 207(b) of the Agricultural Trade Development and Assistance Act of 1954 (P.L. 480), as amended, and Supplement Appendix I of 22CFR Part 211. The Bureau for Humanitarian Response's Office of Food for Peace (FFP) solicits comments from the Food Aid Consultative Group and United States Agency for International Development (USAID) Missions, Regional Bureaus, and Central Bureaus. These guidelines, though not regulation under Section 207(c) of P.L. 480, were made available in final draft for public comment through a notice published in the Federal Register.

In their final form, these guidelines are provided for use by Cooperating Sponsors (CSs) and USAID Missions during the preparation and review of P.L. 480 Title II multi-year operational plans known as Development Assistance Program (DAP) proposals. USAID Missions may provide additional suggestions for proposals to respond to critical food security constraints in the recipient country. The final guidelines apply to all proposals for new Title II development programs. The review, approval, and reporting procedures for Title II development programs are also described.

Hard copies of guidelines are available from FFP directly, or electronically from FFP's home page on the Internet (http://www.info.usaid.gov/hum\_response/ffp).

#### DEVELOPMENT ASSISTANCE PROGRAM PROPOSALS

#### I. Standard Submission and Review Cycle

CSs will submit proposals to the appropriate USAID Mission no later than November 1<sup>st</sup> of the calendar year prior to the FY in which the activities are to commence (for example, by November 1, 2001 for activities to start in FY 2003, which starts October 1, 2002) and to USAID/Washington no later than December 15, 2001. USAID Missions will review DAP proposals and DAP Amendments and submit comments to USAID/Washington within 45 days of receipt of the complete DAP. USAID/Washington will reach a final decision (approve and negotiate a signed transfer authorization, or deny approval) on DAP/DAP Amendments within 45 days of submission of a complete document to USAID/Washington.

CSs will be expected to submit the same DAP/DAP Amendment to USAID/Washington as they submit to the USAID/Mission. A formal review of DAPS/DAP Amendments during the second 45 day period will be held either in Washington or the field, starting in the month of January. USAID/Washington will review the DAP/DAP Amendment and USAID/Mission comments and send an "issues letter" to the CS one week in advance of the formal review meeting with the CS. By the end of the second 45 day period, FFP will communicate the decision made regarding approval or denial of the proposal. In the case of denial, FFP will specify the reasons and inform the CS of the conditions that must be met for approval of the proposal, and the likelihood that these conditions can be met within 120 days of the

letter. Alternatively, proposals may be submitted the following FY. In all cases, a complete, revised DAP/DAP Amendment will be required.

FFP requests that CSs make every attempt to meet these deadlines. In the event that these deadlines cannot be met, CSs are requested to notify FFP in advance of the submission due date and obtain agreement from FFP on alternative dates for the submission, review, and approval of new DAPs/DAP Amendments.

# **II. Development Program Submission Models**

Depending upon the degree of collaboration between the local USAID Mission and the potential Cooperating Sponsor, three general approaches toward DAP submission are outlined below: coordinated country development programs, regional development programs, and stand-alone development programs. The country consolidation model (described below), represents the optimum in program coordination in-country and could minimize the number of program units that would require management attention at the USAID Mission and in FFP. Some degree of program coordination is required where three or more CSs have programs in one country.

Consistent with P.L. 480 Section 202(b)(2) - programs cannot be denied solely because they do not conform to a development plan for the country prepared by the Agency, or because USAID does not have a presence in the country. The models described below may be modified depending upon the individual circumstances.

#### A. Coordinated Country Development Programs

### 1. Individual Submission

Under this model, CSs submit individual proposals with joint activities, which may range from simply a joint monetization to a fully coordinated activity where CSs carry out highly similar programming interventions in different geographic areas, or highly complementary interventions, feeding into joint impact objectives and achieving a high degree of coverage over the country's areas of described need. Proposals ideally should be based upon a single country-level needs assessment. Joint baseline and evaluations may also be part of this model.

Although not a requirement, USAID welcomes proposals that demonstrate consistency of the activity with the Mission's strategic plan. CSs are encouraged to participate in planning processes of USAID Missions, as members of expanded strategic objective, strategic support objective and/or special objective (SO) teams. They are also encouraged to participate in the identification of country development problems and the development of information showing the relationship between the use of Title II food aid and improved food security with Mission strategic objectives. Where CS programs are an integral part of a Mission's strategic plan, financial support from the USAID Mission is more likely.

National-level food security needs assessments should be relied upon to identify a limited number of key problems and interventions in order to have a greater impact on food security problems. These assessments may be conducted jointly, individually using a common methodology, or CSs can commonly rely on a single assessment conducted by a third-party organization. Information on the relative food insecurity levels of the target geographic area or region should also be presented. More in-depth household assessments are also critical to indicate the kind of interventions likely to have an impact on food security and nutrition.

Joint strategic and operational planning, utilization of common methodologies and approaches toward health service delivery, agricultural problems, education, etc., allows programs to scale up to meet greater numbers of beneficiaries as well as to realize efficiencies in monitoring and evaluation design and exercises. Similarly, where several CSs carry out monetization activities jointly, management efficiencies and improved cost recovery has generally been the result.

#### 2. Consolidated Submission

Under this model, any range of the joint activities stated above may be included, however the proposal may be submitted with a single lead agency and subrecipient agencies. The prime CS will be given flexibility in annual adjustments in commodity and budget levels between implementing organizations, within the overall life-of-activity levels approved for the proposal. A single AER and budget would be expected, along with single CSR4s and evaluations over the duration of the DAP. This model in encouraged where implementing organizations can come together and provide complementary skills and services to a larger program. Similarity or complementarity between the programs would be expected.

# B. Regional Development Programs

A consolidated regional proposal may be deemed appropriate where USAID Mission presence is non-existent or it is highly difficult to integrate Title II activities with the USAID Mission strategic plan. In this instance, a single CS would submit a plan for programs with a common sectoral focus (e.g., health, agriculture, water and sanitation, etc.), operating in a region (South Asia, East and Southern Africa, West Africa, Central America, or South America), subject to the geographic priorities noted in section VI.B. on page 7. If monetization is proposed as a significant funding source, the region should be more tightly defined as a group of adjacent countries. Joint regional monetization activities would be subject to the requirements outlined in FFP's Monetization Field Manual. Bellmon analyses must be done individually by country, although monetization may be conducted in one or more countries to provide local currency funds for all programs covered by the regional DAP.

Proposals must include a complete analysis for each country program, all of which must demonstrate impacts at the household level. During the DAP period, CSs will have flexibility to adjust annual country funding levels within the regional group of countries through the annual resource request approval process.

Although not a requirement, FFP encourages a CS contribution as a cost share for all DAPs. In exchange for the flexibility granted in a consolidated regional program, CSs would be expected to provide significant financial inputs as a cost share, for example 10% of the overall budget. CSs would also be responsible and held accountable for meeting the Congressional Title II mandate for processed/bagged commodities within the regional program. The CS will also be required to comply with all standard Title II policies.

Where a CS considers moving to a regional approach, currently approved programs should not be terminated early. However, amendments to a regional program may be made in order to phase-in additional country activities to a regional program.

# C. Stand-alone Individual Development Programs

Under this model, CSs submit individual proposals, which may or may not have significant coordination elements with either the local USAID Mission or other CSs.

If a USAID Mission determines that the Title II proposed activity does not fit into its strategic objectives, the Mission will be expected to review the proposal and provide comments to FFP. However, the proposal's lack of conformance with Mission strategic objectives, alone, will not be considered as grounds for disapproval by USAID.

Such proposals will be considered entirely on their merits against the proposal review criteria.

# III. Proposal Submission in Countries with "Re-delegated" Missions

Where a USAID Mission has CSR4 approval authority, the same general Guidelines apply.

# IV. Proposal Submission in Countries without USAID Missions/ Regional Proposal Submission

Where no USAID Mission is present in the country, the proposal should be submitted by the CS to the designated USAID "twinned" Mission, or U.S. country team for review. In West Africa, CSs should also submit a copy of the proposal to the Regional Food for Peace Officer for review. If a REDSO or bilateral Mission covers the country, the country team is encouraged to incorporate REDSO FFP officers into the review. Following completion of the review, the U.S. diplomatic post's country team (e.g., Chief of Mission and department heads, economic-commercial, political, and agricultural attachés) will provide comments to FFP. The CS should contact FFP if it has questions regarding submission.

If a CS were proposing a regional program, the proposal would be submitted to all applicable USAID Missions and field units for review and submission of comments to FFP.

#### V. Procedures for the Final Year of a DAP

Impact evaluations should have been conducted in the next to final year of a DAP, and during the final year, the report should be submitted to FFP. FFP expects that CSs will plan for all commodities to be distributed, and all costs to be incurred against the approved monetization budget, by the program completion date. Closeout guidance is available on FFP's homepage (www.usaid.gov/hum\_response/ffp/closout.htm). A closeout plan is required to be submitted to the USAID/Mission and FFP six months prior to the expiration of a program.

# VI. Proposal Review and Approval Criteria

The following criteria are those against which all proposals will be reviewed, and against which program quality will be judged.

# A. Technical Quality

# 1. Problem Analysis

Proposal makes a strong case for the chosen location and target population, addressing food insecurity. The proposal describes how and why the target population(s) have been selected. The geographical and demographic targeting in-country is justified using appropriate needs assessment techniques, including a country-wide analysis that addresses the nature, causes, scope and consequences of the food security problem. The same level of problem analysis is required for all new DAPs, whether a follow-on to a previously approved proposal or a completely new proposal.

### 2. Program Objectives and Impact

- a. Strategic objectives and intermediate results are clearly and concisely presented, and are in accordance with food security objectives as stated in USAID's Food Aid and Food Security Policy paper, especially household nutrition and agricultural productivity.
- b. Activity design presents a convincing case that food security results will be achieved in relation to key causes of food insecurity in the host country and/or address key food security needs of the target community. Interventions being proposed have a clear and logical relationship to [the proposed] objectives, and are technically sound, so that objectives are realistically achievable during the life of the activity.
- c. The level of anticipated food security impact is measurable at the local household level.
- d. Proposal demonstrates prospects for financial and/or institutional sustainability of intended benefits. Measures of sustainability may include: cost recovery, financial commitment of partners to continue activities after cooperating sponsor support is withdrawn, cost share, increased technical/managerial capacity of counterparts (e.g., the strengthening of local government, non-governmental organizations (NGOs) or other partners), and increased local capacity to address food security, including preparing for, and/or mitigating the effects of natural disasters or responding to emergencies.
- e. Financial and staff resources are sufficient to achieve the objectives proposed, and are reasonably estimated and allocated.

Proposal demonstrates integration and coordination of P.L. 480 Title II program activities with other development interventions in the area. Integration and coordination may include work with the community, local government, USAID Mission, other donors and/or other non-governmental organizations, including Title II program CSs, wherever possible. Special consideration will be given to consolidated country programs that reflect CS collaboration in pooling resources to work toward the same food security-enhancing objectives.

#### 3. Monitoring and Evaluation

Proposal articulates a comprehensive and actionable methodology for monitoring and evaluation, that includes baseline data, (or a plan to complete the baseline data collection within the first year of the DAP), measurable intermediate results, and procedures to collect, analyze, and incorporate results in modifying the activity based on lessons learned. Mid-term program evaluations should normally be conducted in year three, and impact evaluations in year four.

# 4. Enabling Environment

The economic, political and social environment(s) in which the proposed activities are to take place is determined by USAID staff to be sufficiently stable, and is conducive to the implementation of development activities.

### **B.** Geographic and Sectoral Focus

Priority for programs in sub-Saharan Africa and South Asia will be reflected in the Congressional Budget Justification (CBJ) country allocations determined by FFP. Consistent with the policy paper, all Title II programs will address problems of food access, availability, and utilization. The focus on food access and availability is largely on agricultural production and marketing in rural areas, where the majority of poor live. Raising agricultural production for all households is critical, as is improving rural infrastructure to facilitate trade and lower and stabilize prices of agricultural commodities. Raising incomes from both agricultural commodity sales and non-farm micro-enterprises is key to broad-based improvements in food security. The focus on food utilization includes such areas as maternal and child health, control of infectious diseases, nutrition education, and water and sanitation. Research indicates that the most important groups to reach are pregnant and lactating mothers and children under two years. Malnutrition in this age group has a lasting impact on a child's ability to mature and grow mentally and physically.

#### C. Legislative Mandates

Proposals that utilize value-added commodities will receive priority over proposals that utilize commodities not appearing on the value-added commodities listing (See Annex G). Proposals with a significant direct distribution component will be given priority. Proposals for larger programs are more efficient in assisting the Title II program to meet its sub-minimum tonnage requirements for non-emergency programs.

#### **D.** Integration and Partnership

Proposals that demonstrate integration and coordination of P.L. 480 Title II program resources and activities with other CS resources and development partners are in principle more likely to be sustainable. Integration and partnership should include work with the community, local government, USAID Mission, other donors and/or other non-governmental organizations, including Title II program CSs, wherever possible. Integration of CS and other partner resources is highly encouraged, and where integration of CS resources occurs, it must be expressed as a formal cost share in DAP approval documentation. Special

consideration will be given to consolidated country programs that reflect CS collaboration in pooling resources to work toward the same food security-enhancing objectives.

# **E.** Cooperating Sponsor's Capacity

The CS has demonstrated adequate technical, financial and managerial capability to design, implement and monitor the proposed activity (including the number and size of programs managed or proposed). Its use of Title II non-emergency resources complements the CS's strategy for the particular country and/or region. CS headquarters, in-country, or regional personnel also demonstrate an adequate ability to backstop the proposal. The proposal explicitly addresses the types of capacity building that will take place within the CS or counterparts to increase the sustainability of results.

# VII. Instructions for CS Preparation of Development Assistance Program Proposals

Proposals must:

- be written in 12-point type (narrative) in English
- be limited to 60 numbered and dated pages (including Appendices A-C);
- be submitted as files saved as MS Word 97 (text) and Excel spreadsheets (attachments)
- include only the information requested (state if a section is not applicable; cross referencing and use of charts are encouraged to present information concisely and eliminate repetition)

Use of the proposal format provided in Annex A is strongly encouraged. CSs are required to submit 2 unbound copies and 1 electronic copy to the USAID Mission no later than November 1<sup>st</sup>, and 1 unbound copy and 1 electronic copy on diskette to FFP no later than December 15th. (Where REDSO offices operate, the USAID Mission should receive 1 hard copy and 1 electronic copy, and the REDSO office should receive 2 hard copies and 1 electronic copy).

#### A. Executive Summary

The proposal should include a concise summary of the proposed Title II activity, including number of years (up to five) for which funding is proposed, and the background of the food security problem along with a very brief history of CS activities in the region.

# **B.** Problem Analysis and Proposed Interventions

CSs should provide a detailed analysis of the food security problem and briefly summarize their proposed interventions. Country-level food security analyses are preferred, and where there is more than one CS operating in a country, joint analyses and intervention plans are encouraged. These should cover:

- **Nature:** Identification of the food security problem(s) on a national and local level, and what needs to be done to alleviate it (them);
- **Causes:** Perception of causes at the national and local levels, and the relationship among causes.
- **Scope:** Number of people affected by the problem, its distribution among economic and social groups and geographic areas;
- **Consequences:** Effect of the problem on the quality of life of groups of special concern (such as women and children); priority level of the problem according to representatives of the host country.

# C. Program Objectives and Design

This section covers the proposed objectives and the activities intended to achieve them. For each objective and its related activity, a narrative is requested.

# 1. Specific Objectives

CSs are asked to prioritize objectives, keeping them focused and limited in number. CSs should ensure that program objectives and activities are identified in relation to the technical sectors described under activities, below.

A time frame is requested for the overall activity period for completion of objectives. Strategic objectives should have a direct accordance with objectives in the food security policy paper. Any planned capacity building efforts should be subsumed within specific food security objectives.

#### 2. Proposed Activities

State the target population and describe what is to be accomplished through what types of activities. Briefly state the expected results and impact of the activities.

CSs are asked to describe the activities and target population, and provide technical information regarding the planned interventions. Gender issues must be addressed in the design, targeting and management of the project components. Activities should be laid out in relation to technical sectors, specifically: health and nutrition (including water and sanitation); agriculture production and marketing (including natural resource management, irrigation, and infrastructure); microenterprise activities; education; and humanitarian assistance programs.

Humanitarian assistance programs targeting HIV/AIDS may be appropriately integrated with MCH or other Title II sectoral activities, where it is determined that HIV/AIDS represents a critical constraint to household food security. HIV/AIDS activities should be integrated with those funded by other sources (CS, USAID Mission, etc.), as well. Where possible, direct co-programming of resources (CS, USAID Mission, etc.) should be undertaken. For activities with HIV/AIDS components, the impact of HIV/AIDS on household food security and how the proposed activities would mitigate that impact should be described.

### 3. Key Assumptions and Risks

The proposal should discuss the key or critical assumptions of the planned activity and any risks, which may negatively affect expected results and briefly describe any contingency plans to mitigate the effect of changes in critical assumptions.

### 4. Sustainability and Exit Strategies

CSs are asked to present their exit strategy for Title II assistance; their sustainability strategy for activity results, and how sustainability will be measured.

#### 5. Lessons Learned

In the case where the CS had a previous Title II program in the target country, the activity design should incorporate lessons learned from previous activities and respond to the concerns raised in recent evaluations or audits. Where the project builds on non-Title II investments/activities in the area, outline these activities, their impact, and lessons for the current proposal design.

### **D.** Complementarity

The proposal should: describe how the interventions support or complement host government (national, regional, or local), CS and USAID Mission strategic development objectives; note any complementarity between the proposed program and other development activities being undertaken in the country; indicate where complementary programs are being carried out; state how Title II resources are being integrated with other resources; and describe partnerships and alliances with community and local groups, as well as with other CSs.

When collaboration with other CSs is anticipated, the proposal should note whether the organizations are working toward the same specific objectives, carrying out similar or complementary activities, and how they plan to pool resources to do so. When multiple CSs are proposing a consolidated submission the relationship between the lead and sub-recipient agencies should be described.

### E. Detailed Implementation Schedule

A detailed, time-phased implementation schedule for each FY of the proposal should be included. Refer to the appropriate USAID field unit regarding the degree of detail desired, as the USAID Mission is the primary review point for the implementation schedule.

### F. Audits

The proposal should describe the planned audit activity in relation to the proposed Title II program.

# **G.** Monitoring and Evaluation

1. Monitoring and Evaluation Plan

A monitoring and evaluation plan should be developed and implemented to measure the performance indicators and report on the degree of achievement of performance targets. A viable plan should include the following:

- a. For each indicator, clearly identify the type of data to be collected, the frequency of data collection, the methodology to be used, the population covered, key assumptions anticipated in the planned interpretation of data, and the personnel who will collect and analyze the data.
- b. Describe the information and data collection systems in place or planned that will be used to track progress related to annual monitoring indicators. Describe how monitoring information will be used to adjust activity implementation.
- c. Describe the evaluation component of the activity planned for measuring progress related to impact indicators, including personnel and funding required. In addition, describe the evaluation design, including sampling plan and plans for control groups, if any; describe sources of baseline data; and present a time line for the baseline study (which should be completed within the first year), the mid-term evaluation, and an impact evaluation (which should be conducted in the fourth year of the program). Where behavioral change is sought, describe the monitoring procedure (technique, frequency) which will be used to measure behavioral change.
- d. If the activity includes components that require submission of an Initial Environmental Examination or Environmental Assessment, including activities related to agriculture, natural resource management, water and sanitation, and/or physical infrastructure development, briefly describe how environmental impact will be monitored. Also discuss whether the environmental effects will

be part of the project's overall monitoring and evaluation system, and if so, whether annual and impact indicators have been developed.

# 2. Performance Indicators and Targets

Managing for results requires the identification of objectives, intermediate results, and measurable performance indicators in order to demonstrate sustainable impact of the Title II activity on food security. Performance indicators measure the extent to which the activity results in changes in behavior and well being at the population level, as well as progress in activity implementation. Two types of performance indicators should be identified in the DAP proposal: impact indicators and annual monitoring indicators. (Further information on indicators is available, see Annex H for a list of additional information resources).

The CS should quantify in the proposal the current level of each impact indicator and provide specific targets for the LOA and each relevant program year. FFP recognizes that proposal targets are likely to be estimates, and subject to revision after definitive baseline numbers have been established.

Where appropriate, indicators and targets can be established to capture the impact of mitigation activities that lessen the negative impact of a problem, such as a drought, cyclone, or a high prevalence of HIV/AIDS, on household food security of a particular target group. (A number of HIV/AIDS indicators have been developed previously. CSs are encouraged to review these indicators, available on FFP's homepage, as they develop their DAP.) Where possible, CSs are encouraged to work with USAID Missions so that CS monitoring complements or supplements USAID monitoring and evaluation efforts, and visa-versa.

# **H.** Commodity Market Issues

#### 1. Bellmon Analysis

This is a statutory requirement for the provision of Title II food aid under P.L. 480. The Bellmon Analysis should focus on the first fiscal year of the DAP. For detailed guidance for gathering the information necessary for a Bellmon Determination, CSs should consult the 1985 Background Paper and Guide to Addressing Bellmon Amendment Concerns on Potential Food Aid Disincentives and Storage and the USAID cable titled Bellmon Certification Requirements for P.L. 480 Title II Activities (reissued, August 1999). For supplemental information regarding market analysis, CSs should consult the P.L. 480 Title II Monetization Field Manual. These documents are available from FAM or FFP (see the list of information available in Annex H), and are also online at: http://www.usaid.gov/hum\_response/ffp/monetiz.htm.

A Bellmon analysis must be performed in each country where Title II commodities will be distributed or sold, including each country incorporated into a regional proposal. CSs should note in the text of the proposal who carried out the Bellmon analysis, and provide a very brief statement regarding the summary conclusions, relevant issues or areas of concern, and plans to ensure they are mitigated or resolved. A copy of the Bellmon Analysis should be submitted as an appendix to the DAP proposal. Congress has directed USAID to ensure that U.S. commodities will not have a disruptive impact on the farmer or the local economy of the recipient country.

### 2. Usual Marketing Requirements

Usual Marketing Requirements (UMR) are described in the Monetization Field Manual. UMR estimates are prepared by USDA and include recommended concessional programming ceilings for individual commodities. CSs are urged to discuss these with the local USAID Mission in preparing the DAP proposal. If there are any issues to be addressed, they should be discussed in this section.

# **I.** Activity Resource Requirements

#### 1. Commodities

The following charts and tables should be included in the DAP proposal.

# a. Annual Estimate of Requirements

A signed Annual Estimate of Requirements (AER) reflecting the tonnage to be approved should be provided as Appendix A of the DAP proposal. For follow-on DAPs, a commodity pipeline analysis is provided as part of the AER. The pipeline analysis will be periodically and jointly evaluated by the CS and FFP with particular emphasis on the final prior year Commodity Status Report (CSR) and data provided in the CSR4.

# b. Commodity Worksheet

The commodity worksheet for the life of activity (LOA) should be provided.

### c. Commodity Procurement Schedule

A commodity procurement schedule should be provided.

#### d. Monetization Plan

If monetization is required by the DAP, a monetization plan is required, as outlined in the relevant sections of the Title II Monetization Field Manual.

CSs are reminded that FFP applies the same requirements and procedures regarding vehicle purchases funded by monetization as those funded by Section 202(e) resources; follow instructions as laid out for Section 202(e) funding in Annex E.

#### e. Logistics Plan

A logistics plan addresses commodity-related issues, including port facility, storage infrastructure, port management capabilities, transport status, and commodity pipeline. For landlocked countries, FFP approval is required for the points of entry (limited to four). For special procurement or shipping requests, such as containerization or through bills of lading for non-landlocked countries, a detailed justification is required.

CSs with an on-going program that will request reimbursement for inland transportation charges must provide FFP with a copy of the current contract, and note what changes, if any, are anticipated. If the subject contract is not in English, a translation of the contract should also be provided. In preparing a transportation contract, attention should be paid to USAID Regulation 11 (22 CFR 211) to ensure that all USAID reimbursable costs will be reimbursed by USAID. CSs should also include an estimate of total U.S. dollars needed for inland transportation for the fiscal year.

CSs without a prior Title II program in a given country should submit data from pro-forma invoices or contract quotes submitted by likely inland transport companies.

Submission of the required information to FFP is pivotal to establishing an inland transportation account for reimbursement.

#### 2. Financial Plan

#### a. Budget Narrative

Budget narratives for monetization and Section 202(e) funding are to be included. See Annex E for specific instructions on budgets.

#### b. Budgets

Comprehensive budgets and corresponding detailed budgets should be attached as Appendix B to the DAP proposal. See Annex E for instructions on budgets.

#### c. Overhead Rate

A copy of the organization's latest approved negotiated indirect cost rate agreement (NICRA) is to be included.

#### 3. Human Resources

An organizational chart is required, identifying position titles of CS staff and the amount of time that will be devoted to each proposed activity and the corresponding responsibilities. If major technical assistance is being planned, CSs are to explain the scope of the activity and the individual or organization responsible.

# J. Waiver Requirements

If the non-American procurement of items is intended, source/origin waiver requests and justifications should be made as part of the DAP proposal. In the case of vehicles, the proposal should state how many non-American vehicles are planned for purchase, from which funding source, and justify fully why non-U.S. procurement is necessary. A copy of the written procurement policy of the relevant Mission should be attached. If a vehicle source/origin waiver is requested after the DAP is approved, the process to be followed is described in the Motor Vehicle Procurement section IV.C. of Annex E, Section 202(e) Funding Instructions.

# **K.** Initial Environmental Examination

All DAP proposals submitted to USAID/Washington must include, as an attachment, an Initial Environmental Evaluation (IEE) cleared by the Mission Director or his/her designee (typically a Mission environmental officer). For the consolidated country proposals, a single IEE should be submitted, which covers all activities. For consolidated regional proposals, an IEE should be submitted for each country program. Refer to Annex F for further information.

#### L. Certification Regarding Lobbying

Lobbying certificates must be completed for all proposals.

#### M. Agreements, Contracts & Letters

CSs should attach the current signed CS/Host Country Food for Peace Program Agreement, which should make reference to and incorporate or attach Regulation 11. The DAP proposal should indicate whether there are outstanding issues, such as: the adequacy of the current agreement; exemption from the payment of taxes on Title II program commodities, material, and equipment; the continuation of tax exemptions on distribution commodities; how taxes/fees/tariffs for monetization

commodities will be covered; and how the host country has cooperated with the CS in the implementation of its programs in accordance with Regulation 11 (in the case of follow-on DAPs).

#### DEVELOPMENT ASSISTANCE PROGRAM AMENDMENTS

#### I. DAP Amendment Submission and Review Process

Public Law 480 requires multi-year programs and DAPs are thus reviewed on that basis, including the objectives and purpose of the DAP. Deviation from those objectives and purposes are presumptively unnecessary. In addition, a CS should not propose a significant change to a previously approved program, such as, a) an increase in the total life-of-activity (LOA) resource request based upon the local currency and 202(e) LOA monetization budgets and/or the direct distribution commodity requirements; and/or b) a cumulative change of 10% or more into or between priority sectors (health/nutrition and agriculture) of the comprehensive LOA monetization budget or direct distribution commodity tonnage.

FFP recognizes that there may be changes in implementation arrangements, which may require a substantive review of the foundations upon which the program was originally approved. For example, a radical change in monetization arrangements, timeframe over which program activities would be carried out due to implementation delays as a result of late start-up or external political or climatic events). Under these circumstances the CS and FFP may mutually decide to consider a program revision. CSs are encouraged to consult early with FFP Country Backstop Officers (CBOs) to make this determination.

For CSs with consolidated country or regional programs, DAP amendments will be required only if resources are requested over the overall life of activity for the total combined program, or dramatic program implementation arrangement changes are proposed, as described above.

If there exist conditions such that a CS believes that an Amendment to a previously approved program is warranted, the following guidelines apply.

In instances of commodity or freight price fluctuations, FFP will amend approval documentation (transfer authorizations) to allow an increase in program commodities of an amount representing up to 10% of the LOA value of all program commodities), although a formal DAP Amendment will not be required in this instance.

#### A. Standard Submission and Review Cycle

The same deadlines apply to DAP amendments as described for DAP proposals on page 1 of these guidelines.

### B. DAP Amendment Submission under "Re-delegated" Missions

In a country where a USAID Mission has approval authority for annual resource requests, these Guidelines should be followed. The USAID Mission prepares approval documentation for the Director of FFP's signature.

# C. Consolidated (Country and Regional) DAP Amendments

The need for a DAP amendments for consolidated DAPs should be based upon the same parameters as outlined in I. above.

Some flexibility is provided, for which DAP amendments are not required. Subject to agreements worked out by the CSs, consultation with USAID Missions, Washington and local partners, overall estimated LOA levels, and funding availability:

- 1. The lead CS of a consolidated country DAPs will have the authority to adjust annual program levels between CSs. Changes may be described in the CSR4.
- 2. A CS with a consolidated regional DAPs (a single CS with multiple country programs) will have the authority to adjust annual program levels (up to 10% over the LOA) between country programs. Changes may be described in the CSR4.

# **D. DAP Amendment Review Process**

Approval of new activities and implementation arrangements as described within the DAP amendment will be based on the DAP proposal review criteria. Annual funding will be subject to the availability of funds and commodities.

The first of the stated review criteria, the assessment that "adequate progress is being made towards achieving results as reported in the latest CSR4," is considered a critical factor in the approval of a DAP amendment. The DAP amendment should also provide a brief summary of results to be elaborated on in the CSR4 for the most recently completed fiscal year.

# E. DAP Amendment Review and Approval Criteria

DAP amendments will be approved based on: successful activity implementation, responsiveness to previously expressed concerns and recommendations, evaluation of the resource request (financial plan and AER), mission concurrence, and environmental compliance. Significant changes will be reviewed against the appropriate DAP criteria. Final approval will be subject to commodity and funding availability:

# **II. Instructions for CS Preparation of DAP Amendments**

All DAP amendments should:

- be written in 12-point type (narrative) in English
- follow the format presented in Annex B
- be limited to 30 pages, (including Appendices A-C)
- be submitted as files saved as MS Word 97 (text) and Excel spreadsheets (attachments)
  - include only the information requested (state if a section is not applicable; cross referencing and use of charts are encouraged to present information concisely and eliminate repetition)

Use of the DAP amendment format provided in Annex B is strongly encouraged. CSs are required to submit 2 unbound copies and 1 electronic copy to the USAID Mission no later than November 1<sup>st</sup>, and 1 unbound copy and 1 electronic copy to FFP no later than December 15th. (Where REDSO offices operate, the USAID Mission should receive 1 hard copy and 1 electronic copy, and the REDSO office should receive 2 hard copies and 1 electronic copy).

# A. Executive Summary

CSs should provide a brief statement of proposed program changes. Include an executive summary table for the FY in question, and revised LOA (total of ALL years) in an executive summary of the DAP amendment.

# **B.** Rationale for DAP Amendment Request

Provide a brief summary of the information to be elaborated on in the Results Report for the prior FY. Explain any deviations from the implementation plan. Analyze the lessons learned or other basis for proposed program changes, and provide a rationale for the changes proposed.

CSs should also respond to the technical and programmatic concerns raised during the previous year in the review/approval of the current program year's program, as detailed in the summary cable to a USAID Mission or REDSO and/or FFP's letter of approval to the CSs. The DAP amendment should provide information on actual or planned implementation of the recommendations made and the resulting budgetary impact. It should also explain any delays in implementing recommendations.

# C. Revised Program Details

Based on recent progress and constraints, CSs should: 1) describe changes in objectives, activities, beneficiaries, target areas and implementation arrangements; 2) explain how any modification may affect activity budgets and commodity allocations;

3) note significant changes in your operating environment (e.g., economic, social or political developments) that affected or may continue to affect performance in meeting the objectives, particularly with respect to the required Host Country Food for Peace Program Agreement; 4) update the performance tracking table; and 5) describe monitoring and evaluation plan changes.

# **D.** Detailed Implementation Schedule

The CS is asked to submit a revised detailed implementation schedule for each FY of the DAP. (Refer to DAP proposal instructions as needed).

### **E.** Activity Resource Requirements

#### 1. Financial Plan

The DAP amendment should include a revised financial plan, showing detailed information and comprehensive budget updates for the remaining years of the DAP, and the revised LOA total (include years to date, proposed FY and each out-year). It should also include in the budget narrative an explanation of significant line-item deviations from the original budget or changes in funding sources. CSs are requested to maintain consistency in their budget presentations as they move from the proposal to the first CSR4 and from the first CSR4 through all subsequent CSR4s and DAP amendments.

# a. Budget Narrative

The CS is asked to provide a narrative to clarify budget line items. If 202(e), monetization, or other funds are expected to be carried over from earlier years, explain why. CSs should elaborate upon any budget line items or funding sources that are not self-explanatory. For additional budget instruction, refer to Annex E of these Guidelines.

#### b. Budget Tables

An updated comprehensive budget for all funding sources is required, along with an itemized detailed budget for each FY and LOA (See proposal instructions as needed.) Refer to the formats in Annex D.

### c. Pipeline Analyses

Analysis of monetization and Section 202(e) funds received and expended during the previous period is required to identify anticipated balances available for programming.

#### 2. Commodities

a. Commodity Market Issues: Bellmon Analysis

In the text of the DAP amendment, CSs should note who carried out the Bellmon Analysis and provide a very brief statement regarding the summary conclusions, relevant issues or areas of concern, and plans to ensure they are mitigated or resolved. An updated Bellmon Analysis should be submitted as an Appendix to the DAP amendment if commodity requirements or any other aspects related to the Bellmon analysis have changed significantly.

b. Annual Estimate of Requirement (AER)

A signed AER in standard format (see Annex C) is required.

A pipeline analysis is provided in the AER. The pipeline analysis will be periodically and jointly evaluated by the CS and FFP with particular emphasis on the previous year's end-of-year Commodity Status Report (CSR).

c. Commodity Procurement Schedule

A commodity procurement schedule for the FY's line 17 tonnage as requested in the AER should be provided. See proposal instructions for further information.

d. Commodity Requirement Worksheet - Life of Activity

The DAP amendment should include a revised life-of-activity Commodity Requirement Worksheet by AER category

e. Monetization Plan

If there are important changes to the monetization plan outlined in the original DAP, the changes should be summarized and a brief discussion provided. A cost recovery estimate calculation is also to be provided. See proposal instructions for further information.

f. Monetization Sales

An analysis of the proposed monetization transaction is required.

# F. Waiver Requirements

If the non-American procurement of items is intended, source/origin waiver requests and justifications should be made as part of the DAP proposal. In the case of vehicles,

the proposal should state how many non-American vehicles are planned for purchase, from which funding source, and justify fully why non-U.S. procurement is necessary. A copy of the written procurement policy of the relevant Mission should be attached. If a source/origin waiver is requested after the DAP is approved, the process to be followed is described in the Motor Vehicle Procurement section IV.C. of Annex E.

# **G.** Environmental Compliance

Cooperating Sponsors should submit an IEE amendment. See Annex F for further information.

# **H.** Appendices

Attach the documents listed under "Appendices" in the DAP amendment format provided in Annex B, as appropriate. If a document is lengthy, attach a copy only to the primary ("original") unbound copy of the proposal.

# Annex A

# **Proposal Format**

(insert)

# Annex B

# **DAP Amendment Format**

(insert)

# Annex C

# **AER Format**

(insert)

# **Annex D**

# **Budget Formats**

(insert)

#### Annex E

# Budget Instructions (Section 202(e) & Monetization Funding)

# A. Budget Categories

Provide a detailed line item budget and a narrative justifying the level of Section 202(e) and monetization funding for the life of activity. The narrative and line item budget should include other sources of funding (e.g., CS cost-share, host government, Mission DA), and specifically address the following items:

- 1. Salaries/Fringes/Benefits identify the proposed staff positions. Section 202(e) funds can cover field based expatriate staff, including fringes, benefits, etc., that work full or part time on Title II activities. Section 202(e) funds will not cover local staff salaries, where monetization funding is available to cover this cost. Also, Section 202(e) funds, requested as a direct line- item, will not support heaquarters-based staff.
- 2. Consultants/Technical Assistance identify the type of consultancy/technical assistance needed in support of the Title II activities. Section 202(e) funds may cover all required dollar costs for a given consultancy (e.g., expatriate fees, travel, etc.). Section 202(e) funds will not cover local consultancies, where monetization funding is available to cover this cost.
- 3. Travel (& per diem) separate between local and international travel. Section 202(e) funds will not cover local travel, where monetization funding is available to cover this cost.

International Travel - for requests which include international travel, indicate the number of trips, number of individuals per trip, destination of country, and estimated date of departure. USAID standard provisions state that international travel is allowable if each trip has received prior budget approval. Please refer to the "International Air Travel and Transportation (December 1995)" standard provision.

4. Training - Only those training activities (e.g. Title II workshops on Environmental Compliance) that directly support Title II activities and are country specific will be considered for Section 202(e) funding. Provide a description of each training event and how it will benefit Title II staff and/or beneficiaries. Also, Section 202(e) funds will not cover training activities/costs that are covered by foreign currency, where monetization funding is available to cover these activities/costs.

- 5. Supplies/Materials (individual items below \$5,000) please indicate the type of supplies/materials requested and how these items will support the Title II program. Section 202(e) funds will not cover supplies and materials that can be covered by foreign currency, where monetization funding is available to cover these costs.
- 6. Equipment (individual items above \$5,000) provide a list of all planned equipment purchases with an individual value of \$5,000 or greater and how these items will support the Title II program.

For a definition of "supplies" and "equipment" please refer to 22 CFR Part 226 (USAID Regulation 26).

- 7. Internal Transport For development proposals, FFP recommends that internal transport, distribution, and storage costs be covered by the recipient country government or monetization funding. Section 202(e) will only be considered if the government contribution is inadequate and a monetization program does not exist.
- 8. Other Direct Costs Please list other items such as occupancy, utilities, audit, evaluation, vehicle maintenance, etc. that require dollar funding. Section 202(e) funds will not cover such costs that can be covered by foreign currency, where monetization funding is available.
- 9. Indirect Costs please include a copy (for DAP proposals and amendments only) of your organization's most current Negotiated Indirect Cost Rate Agreement (NICRA) with USAID or cognizant federal office.

# **B.** Motor Vehicle Procurement

- 1. Provide a justification for the procurement of motor vehicles during the life of the grant period, including number of vehicles and the fiscal year during which the purchase is planned: type of vehicles; planned uses of vehicles; and estimate cost of each vehicle.
- 2. Provide a history of vehicle procurement including the size and condition of the current vehicle fleet, age of each vehicle, use of vehicles by activity, and plans for maintenance and replacement.

Since motor vehicles are considered restricted goods, the recipient shall not procure such items without the prior budget approval of FFP. Prior budget approval means that motor vehicles have been identified and incorporated in the program description or schedule of the award or amendments to the award; and the costs related to the motor vehicles are incorporated in the approved budget of the award. Where the item has not been incorporated into the award as described above, a separate written authorization from FFP must be provided before the item

is procured. Refer to the "USAID Eligibility Rules for Goods and Services (March 1997)" standard provision and ADS 312 "Eligibility of Commodities."

Unless FFP agrees otherwise in writing, motor vehicles financed under Section 202(e) must be manufactured in the United States. All procurement of non-U.S. vehicles requires a separate justification to be submitted to FFP and the relevant USAID Mission, and subsequent FFP approval. Waiver requests to purchase non-U.S. vehicles are to be included in the DAP proposal or amendment. Each request for non-U.S. vehicles will be reviewed according to the justification why U.S. vehicles are not adequate to carry out Title II activities and must be consistent with the cognizant USAID Mission's vehicle procurement policy/plan. The Mission Contracts Officer and/or Executive Officer (EXO) must advise FFP of their concurrence with the request, and a copy of the Mission's vehicle procurement policy should be provided to FFP. Refer to 22 CFR Part 229 "Source, Origin, and Nationality" ADS 310 and 312.

### C. Requests for 202(e) Funding

Section 202(e) funds may be requested in order to support a Title II non-emergency program. Section 202(e) funds are considered an integral part of any Title II program and, therefore, are submitted as part of a DAP proposal, DAP amendment or CS Results Report/Resource Request (CSR4).

FFP intends to obligate Section 202(e) funding that parallel the life of the corresponding approved DAP. However, Section 202(e) funds are awarded on an annual basis subject to an annual review, the previous year's unexpended pipeline funds, and the availability of new funds. Therefore, FFP requires that each eligible organization request additional Section 202(e) funds for each year of an approved DAP, where appropriate. For future year requests, (i.e., CSR4 review), please make note of any changes to the activities and/or budget as presented in the approved DAP proposal.

For U.S. organizations, Section 202(e) funding is executed on the condition that funds be administered in accordance with the terms and conditions as set forth in 22 CFR 226 (USAID Regulation 26), entitled "Administration and Assistance Awards to U.S. Non-Governmental Organizations" and applicable standard provisions. Non-U.S. organizations will be required to follow the "Standard Provisions for Non-U.S. Non-Governmental Organizations" as found in ADS 303.

#### **D.** Restrictions

Section 202(e) funding will not be approved for the following types of activities:

- 1. Costs that can be financed from other sources, such as Title II monetized proceeds, ITSH, Title II Institutional Support Assistance grants (ISAs), other USAID funding, and other donor contributions;
- 2. Costs of development activities that are not supported by Title II resources;
- 3. Needs assessments to explore possible new Title II programs (assessments are covered by ISAs).

#### Annex F

# **Environmental Review and Compliance Information**

# I. Background on Regulation 16

USAID's Environmental Procedures (known as 22 CFR 216 or Reg. 16) are meant to ensure that (1) the environmental consequences of USAID-funded activities are identified during the design stage, and that these consequences are considered prior to funding approvals and a decision to proceed with activity implementation; and (2) if possible, activities are identified that preserve or restore the natural resource base where the activity is located.

# II. Title II Compliance with Regulation 16

Compliance with USAID's Environmental Procedures (known as 22 CFR 216 or Reg. 16) is required of all Title II development activities, whether they are supported by food assistance or Section 202(e) funding. All Title II Development assistance program proposals should include an Initial Environmental Examination (IEE) with their proposal. If the IEE of the original DAP was cleared without conditions or a categorical exclusion was granted, the CS should only state "No changes" in the Environmental Compliance section of the CSR4 submission.

In all other situations, the CS should include, as an appendix to the CSR4, an Environmental Status Report (ESR) detailing the actions they have undertaken with regards to the previously approved IEE. The ESR should indicate whether mitigation plans are on schedule and detail the monitoring and evaluation measures being undertaken by the Cooperating Sponsor. The ESR face sheet must be signed by either the Mission Environmental Officer or the Food for Peace Officer. It should include an Environmental Status Report detailing the actions they have undertaken with regards to their previously approved IEE. This status report may be between 2-10 pages and should indicate if mitigation plans are on schedule and should detail the monitoring and evaluation measures being carried out by the Cooperating Sponsor. However, if a CS's submission contains changes that require a DAP amendment, an IEE amendment may need to be submitted with the DAP amendment. Please see sections A through D below for further details.

Cooperating Sponsors are encouraged to seek Mission review and clearance on DAP IEEs prior to official submission of the proposal to FFP/Washington. The same is true for CSR4 ESRs and IEE amendments for CSR4s or DAP amendments. Environmental documentation, marked draft, may be submitted informally through the Mission to the Bureau Environmental Officer. If environmental documentation is submitted with the DAP proposal, DAP amendment or R4 without having been cleared by the Mission, the CS should insure that it is clearly labeled as "draft -- not cleared by Mission." All draft Reg. 16 documentation must be returned to the Mission for required clearance and the Mission may request revisions to ensure that Mission objectives, consideration of local conditions

and consistency with environmental documentation of other Sponsors in the same country is achieved.

# A. New DAPs

To meet this requirement, all DAP proposals must include an IEE, which must be cleared by the Mission Director or his/her designate. A statement as to whether the Mission concurs/does not concur with the CS's ESR (if applicable) should be included in the Mission's approval/comments cable to FFP. The CS is expected to submit the cleared document with their operational plan to FFP for clearance. FFP will obtain clearance from the FFP Director and forward the IEE to the BHR Bureau environmental Officer (BEO) for final concurrence. Note however, that if CSs and Missions are interested in getting feedback from the BHR, Geographic BEOs or a Regional Environmental Officer (REO) on a draft IEE prior to formal submission, they are encouraged to submit a copy for informal review to one or both BEOs or to the REO, where they exist. An IEE face sheet should accompany the IEE.

# **B. DAP Amendments**

All DAP amendments must include an IEE amendment if a change has occurred from what was submitted in the original IEE. The same clearance process is followed as described above for DAP proposals. If no change has occurred, the process as described below for CSR4s should be followed.

# C. Cooperating Sponsor CSR4 Submission

If the IEE of the proposal was cleared without conditions or a categorical exclusion was granted, the CS should only state "No changes" in the Environmental Compliance section of the CSR4.

In all other situations, the CS should include an Environmental Status Report as an appendix to the CSR4, detailing the actions they have undertaken or that need to be taken with regard to the previously approved IEE or Environmental Assessment /Programmatic Environmental Assistance where they might exist. In 2-10 pages, the ESR should indicate whether steps need to be taken to modify previous environmental documentation and whether conditions are being met (e.g., mitigation plans are on schedule and monitoring and evaluation measures are being undertaken by the Cooperating Sponsor). The CSs should include a matrix, or chart, in the ESR outlining that mitigation plans are being implemented as submitted in previous environmental documentation, (i.e. the IEE). An ESR face sheet is used for IEE amendments.

### D. Deferrals

For those Cooperating Sponsors who received a deferral on one or more aspects of their program from the BHR Bureau Environmental Officer, an amended IEE should be included with their following year's CSR4 to resolve each deferral or indicate that the activity will not be conducted, if that is the case.

# **III. IEE Preparation Resources**

While these guidelines take precedence, The Environmental Documentation Manual also provides guidance on completing the IEE, IEE amendment and Environmental Status Report (ESR). The Manual also covers more in-depth environmental reviews, and defines many of the environmental compliance issues and terms used in these instructions. A Field Guide to USAID Environmental Compliance Procedures is a shorter field guide. In addition to these documents, both the Mission and Bureau Environmental Officers, and where they exist, Regional Environmental Officers, should be consulted.

#### Annex G

# **Commonly Used Value-Added \* Commodities**

(\*Determined to be Processed, Fortified or Bagged:)

Bulgur Wheat Hard Red Winter, Bagged
Corn, Bagged Wheat Soft White, Bagged
Cornmeal Wheat Hard Durum with BNT
Corn Soy Blend Wheat Soft Red Winter with BNT
Instant Corn Soy Milk Wheat Hard Red Winter with BNT

Corn Soy Milk Wheat Soft White with BNT Sorghum, Bagged Beans, Navy

Nonfat Dried Milk

Corn Soy Masa Flour

Rice, Bagged Beans, Black

Rice, Bulk with BNT Beans, Great Northern

Soy Fortified Bulgur

Soy Fortified Rolled Oats

Soy Fortified Sorghum Grits

Peas, Green Split

Vegetable Oil 41

Peas, Vellow Split

Vegetable Oil 4L

Wheat Flour

Wheat Soy Blend

Beans, Pinto

Peas, Green Split

Peas, Yellow Split

Potato Flakes

Infant Formula

Whole Dry Milk

Beans, Pinto Whole Dry Mil Peas, Green

Vegetable Oil 20L Peas, Yellow

Butter Cheese

Wheat Soy Milk

Lentils Beans, Red

Fortified Non-Fat Dry Milk Butteroil 55 gal Drum

Corn, Bulk with BNT

Wheat Hard Durum, Bagged Wheat Soft Red Winter, Bagged

Wheat Northern Spring Dark, Bagged

BNT=Bags, Needles & Twine

#### Annex H

# **Supplemental Information List**

- 1. Legislation and Policy
  - Regulation 11 and Public Law 480 (as amended through Public Law 104-130, April 9, 1996) \*
  - Food Aid and Food Security Policy Paper, 1995 \*
  - List of LDC/LIFDC Countries, 2000 \*
  - Annual FFP Policy Letter (September, 2001) \*
- 2. Commodity and Monetization Documents
  - P.L. 480 Title II Monetization Field Manual, November 1999 \*
  - Background Paper and Guide to Addressing Bellmon Amendment Concerns on Potential Food Aid Disincentives and Storage\*
  - Commodity Reference Guide \*
  - Bellmon Certification Requirements for P.L. 480 Title II Activities cable: STATE 086386
- 3. Monitoring and Evaluation and Program Reporting Reference Materials
  - Cooperating Sponsor Results Report & Resource Request Guidelines \*
  - FANTA Indicator & Evaluation Guides \*
  - Performance Indicators for Food Security (published by CDIE)
- 4. Environmental Compliance Information for Title II Programs
  - Environmental Documentation Manual (October, 1999)
  - A Field Guide to USAID Environmental Compliance Procedures (March 5, 1999)
- 5. P.L. 480 Title II: Close-out Plan Guidance \*
- 6. FFP Communications to USAID Missions Regarding Title II Development Programs
  - Mission Instructions on the Review of Title II FY 2003 Cycle CSR4s, DAPs, and DAP Amendments (cable)
  - Checklist for Mission Management of Title II Programs (with examples) \*
  - Memorandum of Understanding for "Delegated" Missions (sample)
  - Enhanced Mission Authority over Title II Programs in Selected Countries (cable)

Note: Starred (\*) documents are available directly or via links at ttp://www.usaid.gov/hum\_response/ffp.

Other documents are available upon request from FFP (email: rinewberg@usaid.gov).